

EXHIBIT C

From: Jovan Jovanovic <jjovanovic@watson-ip.com>
Sent: Friday, April 5, 2019 1:40 PM
To: Chad Nydegger; Vladan Vasiljevic
Cc: David R. Todd; Jennifer Hunter; Justin J. Cassell; Matthew J. Gipson
Subject: Re: Humboldt v. Lornic [WNDMS-DMS1.FID1916141]

Chad,

First, as indicated in my email on the matter, disclosure of experts was due on March 30 only for those experts that will be providing opening reports on April 29th. Lornic will not be providing any opening expert reports on April 29th and, thus, did not disclose any experts on March 30th. We reserve the right to provide rebuttal expert reports on June 11th and will disclose any experts providing such reports no later than 30 days prior to the provision of those expert reports.

Second, as trial is not scheduled to commence until August of 2020, we have not yet determined who will be acting as trial counsel.

Jovan

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From: Chad Nydegger <cnydegger@wnlaw.com>
Sent: Wednesday, April 3, 2019 1:58 PM
To: Jovan Jovanovic; Vladan Vasiljevic
Cc: David R. Todd; Jennifer Hunter; Justin J. Cassell; Matthew J. Gipson
Subject: Humboldt v. Lornic [WNDMS-DMS1.FID1916141]

Jovan and Vlad,

We hope that you are both well. We write to you concerning two issues.

First, we note that we did not receive any disclosure from Lornic of expert on the issue of validity on March 30 in accordance with the First Amended Case Management Order. Consequently, we understand that Lornic will not have any expert testify on the issue of validity. Please confirm that our understanding is correct. If our understanding is not correct, please explain Lornic's failure to disclose the expert, particularly after we consented to your reading of the order as requiring the disclosure of any such expert no later than March 30.

Second, we write concerning Jovan acting as trial counsel in this case. Given that Jovan was the Rule 30(b)(6) witness for Watson IP during discovery, and, consequently, will be a witness at trial, he cannot serve as trial counsel. Please confirm that Jovan will not act as trial counsel in this case. If Lornic is unwilling will to confirm that Jovan will not be trial counsel in this case, please provide us with a time you are available to meet and confer as Plaintiffs will need to file a motion to disqualify.

Regards,
Chad

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